Case 1:22-cv-05789-JPC-SDA Document 43 Filed 03/03/23 Page 1 of 2

AKABAS & SPROULE

ATTORNEYS AT LAW 488 MADISON AVENUE 11TH FLOOR NEW YORK, NY 10022 (212) 308-8505

FACSIMLE (212) 308-8582 WWW.AKABAS-SPROULE.COM USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:___
DATE FILED:_ 3/3/2023

SETH A. AKABAS
MICHAEL H. SPROULE †
DAVID E. BAMBERGER
SENIOR COUNSEL
THOMAS A. CANOVA

MARTIN TODTMAN

JESSE E. GREENE

† ADMITTED NY & MA

COUNSEL
RUTH J. WITZTUM
HENRY RAKOWSKI
RICHARD A. MEDINA**
MARTIN L. LERNER***

LOUIS J. LAMATINA* S105 FARVIEW AVENUE PARAMUS, NJ 07652 (201) 291-1122

** ADMITTED NY & NJ
*** ADMITTED NY & CA

March 3, 2023

BY ECF

Honorable Stewart D. Aaron Daniel Patrick Moynihan United States Courthouse 500 Pearl Street, Courtroom 11C New York, New York 10007 Application GRANTED. The telephone conference scheduled for Monday, March 6, 2023 is adjourned until Wednesday, March 22, 2023 at 11:30 a.m. At the scheduled time, the parties shall each separately call (888) 278-0296 (or (214) 765-0479) and enter access code 6489745. SO ORDERED.

Dated: 3/3/2023

Re: Universal Dyeing & Printing, Inc. v. Lynn Brands, LLC Civil Action No. 1:22-cv-05789-GHW-SDA

Request to Adjourn March 6 11 am EST Status Conference

Your Honor:

As you may recall, I represent defendant Lynn Brands, LLC ("LB") in the above-referenced action.

I write pursuant to Rule 1D of Your Honor's individual practices to respectfully request an adjournment of the status conference currently scheduled for Monday, March 6, 2023, at 11:00 a.m. EST.

Counsel for the plaintiff, Universal Dyeing & Printing, Inc. ("UD"), Laura Zaharia, Esq., and counsel for the third-party defendant, Ballon Stoll Bader & Nadler, P.C. ("Ballon"), Deborah Isaacson, Esq., have consented by email to the adjournment.

The reasons for the request are: (1) UD and LB have now executed and exchanged a Settlement Agreement and Release and I have initiated ACH payment of the entire settlement payment (which payment will be received by Ms. Zaharia's law firm trust account on March 6); and (2) LB and Ballon have agreed to a dismissal, without prejudice, of the third-party complaint herein without costs, disbursements or fees to either party.

In light of these factors, all parties respectfully request a final conference adjournment of two (2) weeks.

All counsel thank Your Honor for your consideration of this request and your assistance in general in bringing this case to a conclusion.

Respectfully submitted,

/s/ David E. Bamberger
David E. Bamberger

Cc: All counsel of record (by ECF)